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June 13, 2008

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BY CM/ECF E-FILING

Honorable Patti B. Saris
Honorable Robert B. Collings
U.S. District Court for the
District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way
Courtroom 19, 7th Floor
Boston, MA 02110

Re: New England Carpenters Health Benefits Fund, et al v. First DataBank, Inc., et al
Civil Action No. 1: 05-CV-11148-PBS

Dear Judges Saris and Collings:

We write on behalf of Express Scripts, Inc. ("Express Scripts"), a pharmacy benefit manager, with regard to Plaintiffs' Motion to Compel Production of McKesson's RelayHealth Data filed in the above-referenced case on April 29, 2008 (the "Motion to Compel").

Express Scripts strongly objects to a Court-ordered production of its highly confidential pricing information. Express Scripts also joins in McKesson's Opposition to the Motion to Compel.

In their Reply in support of the Motion to Compel, Plaintiffs question whether "pharmacies would object to a Court-ordered production of third party reimbursement information." *See* Reply in Support of Plaintiffs' Motion to Compel dated May 16, 2008 at p. 5. The third party reimbursement and pricing information at issue in the Motion to Compel is confidential not only to pharmacies but also to pharmacy benefit managers, like Express Scripts. Pharmacy benefit managers negotiate vigorously with pharmacies to come to agreements regarding pricing and reimbursement rates. As a result, the disclosure of current pricing information would undermine pharmacies and pharmacy benefit managers' ability to negotiate competitive pricing. Were Express Scripts' pricing data to be disclosed, Express Scripts' ability to compete effectively in the pharmacy benefit management industry would be irreparably harmed.

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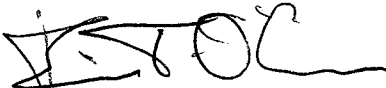
Honorable Patti B. Saris

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In light of the potential harm that may result to Express Scripts as a result of an order compelling production of its confidential pricing information, Express Scripts respectfully requests an opportunity to be heard at today's hearing on the Motion to Compel.

Respectfully yours,



Brian T. O'Connor

cc (by CM/ECF E-Filing): All Attorneys of Record